MDL 1570 PLAINTIFFS' EXECUTIVE COMMIT

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:____
DATE FILED: 9/28/2020

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, Co-Chairs MOTLEY RICE LLC James P. Kreindler, Co-Chair KREINDLER & KREINDLER LLP	Stephen A. Cozen, Co-Chair Sean Carter, Co-Chair COZEN O'CONNOR
Andrew J. Maloney III, Co-Liaison Counsel KREINDLER & KREINDLER ILP Robert T. Haefele, Co-Liaison Counsel MOTLEY RICE ILC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

September 28, 2020

The Honorable Sarah Netburn Thurgood Marshall United States Courthouse 40 Foley Square, Room 430 New York, NY 10007

RE: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") respectfully write to request a two-day extension, to September 30, 2020, for Plaintiffs' Reply in Support of their Motion for Reconsideration of the Court's August 27, 2020 Order at ECF No. 6444. The brief extension is needed as several members of the PECs are unavailable today for Yom Kippur, and the PECs were occupied on Friday with their submission on the deposition proposals. ECF No. 6470. Plaintiffs' Reply Brief will also include their arguments in further support of their conditional objections to the August 27, 2020 Order, which otherwise would not be due until Friday, October 2, 2020.

The Kingdom of Saudi Arabia does not object to this extension request.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Honorable Sarah Netburn September 28, 2020 Page 2

Respectfully submitted,

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian

Steven R. Pounian

Kreindler & Kreindler LLP

750 Third Avenue New York, NY 10017

Tel: (212) 687-8181

E-mail: spounian@kreindler.com

On behalf of the MDL 1570 Plaintiffs' Exec.

Committees

COZEN O'CONNOR

By: /s/ Sean P. Carter

Sean P. Carter Cozen O'Connor One Liberty Place

1650 Market Street, Suite 2800

Philadelphia, PA 19103 Tel: (215) 665-2105

E-mail: scarter1@cozen.com

On behalf of the MDL 1570 Plaintiffs' Exec.

Committees

The Honorable George B. Daniels (via ECF) CC:

All MDL Counsel of Record (via ECF)

LEGAL\48502430\1

Plaintiffs' request for an extension of time until September 30, 2020, to file a reply in support of the motion for reconsideration is GRANTED.

SO ORDERED.

United States Magistrate Judge

Dated: September 28, 2020

New York, New York

MOTLEY RICE LLC

28 Bridgeside Boulevard Mount Pleasant, SC 29465

Tel: (843) 216-9184

By: /s/ Robert T. Haefele

Robert T. Haefele

Motley Rice LLC

E-mail: rhaefele@motleyrice.com

On behalf of the MDL 1570 Plaintiffs' Exec.

Committees